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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

BRRAM, INC., ET AL.,	:	Civil Action No. 3:14-cv-02686 (JAP)
	:	
Plaintiffs,	:	
	:	
v.	:	Hon. Joel A. Pisano, U.S.D.J.
	:	Hon. Douglas E. Arpert, U.S.M.J.
UNITED STATES FEDERAL AVIATION	:	
ADMINISTRATION, ET AL.,	:	
	:	
Defendants.	:	DOCUMENT FILED ELECTRONICALLY

NOTICE OF MOTION FOR EXTENSION  
BY CONSENT OF TIME TO RESPOND TO MOTIONS TO DISMISS  
TO NOVEMBER 5, 2014

To: Paul J. Fishman  
United States Attorney  
J. Andrew Ruymann  
Assistant U.S. Attorney  
402 East State Street, Room 430  
Trenton, New Jersey 08608  
Attorneys for the United States Federal Aviation Administration

and

John E. Flaherty  
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and

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640 McDade Administration Building  
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Attorneys for Mercer County Board of Chosen Freeholders

PLEASE TAKE NOTICE that on November 3, 2014, the undersigned attorney, on behalf of the plaintiffs, BRRAM, Inc., Ms. Holly Bussey, Mr. William Lynch, Mr. Richard DeLello, Ms. Julie Power, Mr. John Giacobetti, Mrs. Jenifer Giacobetti, Ms. Deborah Leamann, Ms. Caroline Bondi, Ms. Delores Brienza, and Mr. Richard Wayne, will move before the Honorable Joel A. Pisano, United States District Judge, United States District Court, at 402 East State Street, Trenton, New Jersey, for an order extending the time to respond to the three motions to dismiss the complaint filed by the defendants, United States Federal Aviation Administration, Frontier Airlines, Inc., and the Mercer County Board of Chosen Freeholders, to Wednesday, November 5, 2014. Replies to the Plaintiffs' response would be due November 19, 2014. The above-named counsel for the defendants have consented to this motion. This motion is brought pursuant to the provisions of L. Civ.R. 7.1(d)(5).

In support of this motion, the plaintiffs will rely upon the Certification of R. William Potter. A form of Order is submitted along with this Notice of Motion.

Plaintiffs do not request oral argument.

Respectfully submitted,

/s/ R. William Potter  
R. WILLIAM POTTER  
Attorney for Plaintiffs

Dated: October 20, 2014.

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UNITED STATES FEDERAL AVIATION	:	
ADMINISTRATION, ET AL.,	:	
Defendants.	:	DOCUMENT FILED ELECTRONICALLY

CERTIFICATION OF R. WILLIAM POTTER IN SUPPORT OF  
MOTION FOR EXTENSION BY CONSENT  
OF TIME TO RESPOND TO MOTIONS TO DISMISS  
TO NOVEMBER 5, 2014

1. I am R. William Potter, Attorney at Law of the State of New Jersey, and counsel for the plaintiffs herein.
2. I make this certification in support of the motion for extension of the time for plaintiffs to respond to the three pending motions to dismiss the complaint to November 5, 2014.
3. On a trip to California I became seriously ill from what appeared to be food poisoning which rendered me incapacitated from working on my legal caseload.
4. On Friday, October 17, 2014, I dictated a message to be sent to all counsel for the defendants in this matter.

5. By Monday, October 20, 2014, all counsel for all defendants consented to the requested extension. Since counsel for all of the defendants have consented to the two-week time extension, there cannot be any prejudice to any party as a result of this time extension.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

Dated: October 20, 2014

/s/ R. William Potter

R. WILLIAM POTTER  
Attorney for Plaintiffs

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UNITED STATES FEDERAL AVIATION	:	
ADMINISTRATION, ET AL.,	:	
Defendants.	:	DOCUMENT FILED ELECTRONICALLY

**[PROPOSED] ORDER**

This matter having been brought before the Court upon the Motion for Extension by Consent of Time to Respond to Motions to Dismiss to Wednesday, November 5, 2014, by the plaintiffs, BRRAM, Inc., et al., pursuant to L.Civ.R. 7.1(d)(5), with replies to the responses due November 19, 2014, with the consent of counsel for all defendants, and the Court having considered the matter,

It is this \_\_\_\_ day of \_\_\_\_\_, 2014, hereby

ORDERED that the Plaintiffs' Motion for Extension by Consent of Time to Respond to Motions to Dismiss to November 5, 2014, is hereby GRANTED. Replies to Plaintiffs' Responses shall be due November 19, 2014.

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JOEL A. PISANO  
United States District Judge